

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CHESTER TSANG, Individually and On Behalf of )  
All Others Similarly Situated, )  
  ) **CIVIL ACTION NO. 07-CV-8706-JGK**

Plaintiff, )  
  ) **“ECF CASE”**

vs. )  
  )

LDK SOLAR CO., LTD., Xiaofeng Peng, Xingxue )  
Tong, Liangbao Zhu, Yonggang Shao, Gang Wang, )  
Jack Lai, and Qiqiang Yao, )  
  )

Defendants. )  
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WEICHEN G. LUI, Individually and On Behalf of )  
All Others Similarly Situated, )  
  ) **CIVIL ACTION NO. 07-CV-8766-JGK**

Plaintiff, )  
  ) **“ECF CASE”**

vs. )  
  )

LDK SOLAR CO., LTD., XIAOFENG PENG, )  
XINGXUE TONG, LIANGBAO ZHU, )  
YONGGANG SHAO, GANG WANG, LOUIS )  
T. HSIEH, JACK LAI, NICOLA SARNO, )  
YUEPENG WAN, RONGQIANG CUI, )  
PIETRO ROSSETTO, QIQIANG YAO, )  
  )

Defendants. )  
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(additional caption on following page)

**PLAINTIFF WEICHEN G. LUI'S RESPONSE TO THE MOTION OF SHAHPOUR  
JAVIZDAD FOR APPOINTMENT AS LEAD PLAINTIFF, APPOINTMENT OF LEAD  
COUNSEL, AND CONSOLIDATION OF RELATED ACTIONS**

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ISMAEL HALIDOU, Individually and On Behalf of All Others Similarly Situated,	)
	)
Plaintiff,	) CIVIL ACTION NO. 07-CV-9745-JGK
	)
vs.	) "ECF CASE"
	)
LDK SOLAR CO., LTD., XIAOFENG PENG,	)
XINGXUE TONG, LIANGBAO ZHU,	)
YONGGANG SHAO, GANG WANG, LOUIS	)
T. HSIEH, JACK LAI, NICOLA SARNO,	)
YUEPENG WAN, and QIQIANG YAO,	)
	)
Defendants.	)
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This is a securities class action brought on behalf of purchasers of LDK Solar Co., Ltd. ("LDK") securities. On December 10, 2007, Weichen G. Lui, through his counsel, requested that the Court appoint Mr. Lui to serve as Lead Plaintiff in this action on behalf of purchasers of LDK securities.

Upon review of the Motion of Shahpour Javizdad for Appointment as Lead Plaintiff, Appointment of Lead Counsel, and Consolidation of Related Actions, it appears that Shahpour Javizdad has the largest loss of any Movant seeking such appointment. Accordingly, Mr. Javizdad appears to be the presumptive Lead Plaintiff, and Mr. Lui does not oppose his motion. However, Mr. Lui expressly reserves the right to present himself as Lead Plaintiff if Mr. Javizdad is determined to be unqualified to be Lead Plaintiff or withdraws for any reason, whether at this or a later stage in this action.

Dated: December 20, 2007  
New York, New York

**MURRAY, FRANK & SAILER LLP**

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**Proposed Lead Counsel for the Class**